

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**In re:** :  
:  
**Courtney Curtis Whitehead** : **Case No.: 18-16383**  
:  
**Debtor(s).** : **Chapter 13**  
:  
\*  
:  
:

**OBJECTION OF U.S. BANK NATIONAL ASSOCIATION TO THE CONFIRMATION  
OF THE PLAN (DOCKET NUMBER 9)**

U.S. Bank National Association ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed plan ("Plan") filed by Courtney Curtis Whitehead ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 1306 W17th Street, Lorain, OH 44052 ("Property").
2. Debtor's Plan treats Creditor's secured claim as long term debt that will survive discharge. However, the subject loan matured on October 17, 2016.
3. Pursuant to 11 U.S.C. §1322(c)(2), Debtor's Plan should provide payment in full of Creditor's claim. Failure to do so will result in immediate default upon completion of the Plan.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/Stephen R. Franks

Stephen R. Franks (0075345)

18-034671\_TC

Edward H. Cahill (0088985)  
Adam B. Hall (0088234)  
John R. Cummins (0036811)  
Karina Velter (94781)  
Sarah E. Barngrover (28840-64)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
Telephone: 614-220-5611  
Fax: 614-627-8181  
Attorneys for Creditor  
The case attorney for this file is Stephen R.  
Franks.  
Contact email is srfranks@manleydeas.com

18-034671\_TC

**CERTIFICATE OF SERVICE**

This is to certify that on November 15, 2018, a true and accurate copy of the foregoing Objection of U.S. Bank National Association to the Confirmation of the Original Plan was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Office of U.S. Trustee, Northern District of Ohio, Party of Interest, (Registered address)@usdoj.gov

Lauren A Helbling, Chapter 13 Trustee, lauren@helblinglpa.com

R. J. Budway, Attorney for Courtney Curtis Whitehead, attyrjb1@hotmail.com

and on the below listed parties by regular U.S. mail, postage prepaid:

Courtney Curtis Whitehead, 1304 West 17th Street, Lorain, OH 44052

Courtney Curtis Whitehead, 1306 W17th Street, Lorain, OH 44052

Lorain County Treasurer, 226 Middle Avenue, Elyria, OH 44035

U.S. Department of Education, P.O. Box 530260, Atlanta, GA 30353

/s/Stephen R. Franks

18-034671\_TC